

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
Robert L. Johnson, III and	)	Bankruptcy No. 19-24929 GLT
Regina W. Johnson,	)	Chapter 13
	)	Related to Document No(s). 70 and 71
Debtors	)	
	)	Hearing Date and Time:
Robert L. Johnson, III and	)	May 31, 2023 at 10:00 am
Regina W. Johnson,	)	
	)	
Movants	)	
	)	
vs.	)	
	)	
Bernard M. Tully, Esquire and Bernard M.	)	
Tully, LLC and Ronda J. Winnecour, Trustee,	)	
	)	
Respondent(s)	)	

**CERTIFICATION OF NO OBJECTION REGARDING APPLICATION TO EMPLOY  
SPECIAL COUNSEL FOR DEBTORS NUNC PRO TUNC**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Application to Employ Special Counsel for Debtors Nunc Pro Tunc filed on April 21, 2023 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Application to Employ Special Counsel for Debtors Nunc Pro Tunc appears thereon. Pursuant to the Notice of Hearing, objections for Application to Employ Special Counsel for Debtors Nunc Pro Tunc were to be filed and served no later than May 8, 2023.

It is hereby respectfully requested that the Order attached to the Application to Employ Special Counsel for Debtors Nunc Pro Tunc be entered by the Court.

Respectfully submitted,

May 23, 2023  
Date:

/s/Christopher M. Frye  
Christopher M. Frye, Esquire  
Attorney for the Debtors  
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